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October 4, 2012

By ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: TelOps International, Inc. d/b/a AmTel Compliance Plan Meeting Notice
of Ex Parte Presentation; WC Docket Nos. 09-197, 11-42

Dear Secretary Dortch:

On Tuesday, October 2, 2012, Mark McWhirter of TelOps International, Inc. d/b/a AmTel ("AmTel") and John J. Heitmann and Denise N. Smith of Kelley Drye & Warren, LLP met with Kimberly Scardino, Jonathan Lechter, Divya Shenoy and Michelle Schaefer of the Wireline Competition Bureau ("Bureau") to discuss AmTel's Compliance Plan filed July 2, 2012 in the above-referenced dockets. At the meeting, AmTel provided the Bureau staff with the enclosed presentation introducing the Company and its management, the Company's Lifeline product offerings and its approach to compliance with the requirements of the *Lifeline Reform Order*.¹ AmTel will be filing a revised Compliance Plan shortly.

This letter and presentation are being filed electronically for inclusion in the public record of the above-referenced proceedings. Please feel free to contact the undersigned with any questions.

¹ See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, 27 FCC Rcd 6656 (2012).

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Respectfully submitted,



John J. Heitmann
Denise N. Smith

*Counsel to TelOps International, Inc. d/b/a
AmTel*

Enclosures

cc: Kimberly Scardino (via e-mail)
Jonathan Lechter (via e-mail)
Divya Shenoy (via e-mail)
Michelle Schaefer (via e-mail)

TelOps International, Inc. d/b/a AmTel FCC Compliance Plan Meeting



October 2, 2012

Agenda

- Introduction of TelOps International, Inc. d/b/a AmTel
- TelOps Lifeline Product Offerings
- Marketing/Advertising Compliance
- End User Enrollment
- Annual Certification
- Procedures for Addressing Waste, Fraud and Abuse
- Questions

TelOps International, Inc. d/b/a AmTel - Overview

- TelOps is certified as a CLEC in Arkansas, Florida, Oklahoma, and Texas
- The Company is designated as an ETC in:
 - Arkansas – Wireline (2010) and Wireless (2011)
 - Oklahoma – Wireline (2009)
 - Pending ETC designation in Louisiana
- TelOps serves approximately 24,000 Lifeline subscribers in Arkansas and Oklahoma
- Provides Non-Lifeline Wireless service in:
 - Arkansas, Florida, Oklahoma, and Texas

TelOps Key Management Personnel

Mark McWhirter, President

- 18 years telecommunications experience
- Responsible for all state and federal regulatory and compliance issues

Jolie McWhirter, Vice President

- 16 years telecommunications experience
- Former Verizon Inventory database programmer

TelOps and its Lifeline Product Offerings

- TelOps is Financially and Technically Capable of Providing the Supported Lifeline Services
 - TelOps has over 10 years' experience providing Lifeline services
 - TelOps' key management personnel have over 30 years' experience in the telecommunications industry
 - TelOps derives revenues from its non-Lifeline wireline services and its wireless services beyond its free wireless Lifeline offerings

TelOps and its Lifeline Product Offerings

TelOps Wireless Lifeline 250 Plan

Includes	Cost
# of Free Minutes	250
Rollover	Yes
Text Messaging	1 text per airtime minute
Handset	Free
911 Calls	Free
Minute Balance Inquiry	Free
Voicemail	Free
Domestic Long Distance	Free
Caller ID and Waiting	Free

TelOps and its Lifeline Product Offerings

Wireline Product Offerings:*

- \$14.95 – Basic Service

Tribal Wireline Product Offerings:*

- \$1.00 - Basic Phone Line
- \$1.45 - Basic Phone Line + Caller ID
- \$1.95 - Basic Phone Line + Caller ID and Call Waiting
- \$6.00 - Basic Phone Line + 11 Calling Features

All Wireline Service Offerings Include:

- Free calls to 911 emergency service

* Rates reflect cost after Lifeline discount. Fees and taxes may apply.

TelOps and its Lifeline Product Offerings

Public Safety and 911/E911 Access:

- TelOps will ensure that all wireless handsets used in connection with its Lifeline service are E911-compliant
- TelOps provides its Lifeline subscribers with access to 911 and E911 services:
 - Through its underlying carrier, Sprint, for its wireless service and AT&T for its wireline services
 - Regardless of activation status or number of minutes remaining
 - At the time of Lifeline service initiation

Marketing and Advertising Compliance

- In compliance with the marketing and disclosure requirements, all of TelOps' marketing materials will include:
- Disclosure of company's name under which it does business
- Clear and easily understood language disclosing the following:
 - This is a lifeline service
 - Only eligible consumers may enroll in the program
 - Qualifying documentation is necessary for enrollment
 - The program is limited to one benefit per household, consisting of either wireline or wireless service
 - TelOps' Wireless Lifeline form will state that Lifeline is a government benefit program and consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program
 - Lifeline service is non-transferable

End User Enrollment

- Direct Sales: Retail Outlet – in person enrollment transaction
 - Customer provides completed Lifeline enrollment form, qualifying documents, and proof of identity.
 - If the form and documents are complete then TelOps' employees conduct a database check for duplicate enrollment.
 - If no duplicate is found then the customer is enrolled and provided a partially-activated handset.
 - Subscribers must activate the phone by making an outbound call
- Phone Sales: Inbound Only
 - TelOps' employees explain the Lifeline program to the customer and a Lifeline enrollment form is mailed to the customer
 - After receiving and verifying the completed Lifeline enrollment form, qualifying documents, and proof of identity TelOps conducts a database check for duplicate enrollment.
 - If no duplicate is found then the customer is enrolled and a partially-activated handset is mailed to the customer.
 - Subscribers must activate the phone by making an outbound call

Annual Re-Certification

- TelOps will recertify the eligibility of all its lifeline customers enrolled prior to June 1, 2012
- Recertification will be concluded by December 31, 2012 and the results submitted by January 31, 2013
- TelOps will continue to recertify each Lifeline end user annually
- All customers who fail to respond to recertification within 30 days will be given a written notice that they have 30 days to confirm their eligibility or be de-enrolled from the Lifeline program
- TelOps also will follow any state-specific recertification requirements

Procedures for Addressing Waste, Fraud, and Abuse

- TelOps will ensure compliance with all policies & procedures surrounding its Lifeline program
 - Marketing/Advertising
 - End User enrollment and recertification
 - Customer non-usage and de-enrollment
 - Training
 - monthly training sessions regarding changes to the Lifeline program
 - monthly recurring training for the programs that qualify a customer for Lifeline service

Questions?

Thank You